

Exhibit F

(First Requests for Admission)

F-1

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BELCALIS MARLENIS ALMÁNZAR,

Plaintiff,

v.

LATASHA TRANSRINA KEBE a/k/a
LATASHA TRANSRINA HOWARD and
STARMARIE EBONY JONES,

Defendants.

Case No.

1:19-cv-1301-WMR

**PLAINTIFF’S FIRST SET OF REQUESTS FOR ADMISSION TO
DEFENDANT LATASHA TRANSRINA KEBE**

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, and the Definitions and Instructions that follow, BELCALIS MARLENIS ALMÁNZAR (“Plaintiff”), by her attorneys Moore Pequignot LLC and Adelman Matz P.C., hereby requests that Defendant LATASHA TRANSRINA KEBE (“Kebe”) answer the following requests for admission (the “Requests”) separately and fully within the period specified by Rule 36.

DEFINITIONS AND INSTRUCTIONS

1. Plaintiff incorporates by reference the definitions set forth in Plaintiff’s First Set of Interrogatories to Defendant Latasha Kebe served on

October 4, 2019.

2. Each matter is admitted unless, within thirty (30) days after service of these Requests, Defendants serve a written answer or objection addressed to the matter and signed by Defendants or their attorney.

3. If objection is made, the reasons therefor shall be stated. The answer shall specifically deny the matter or set forth in detail the reasons why Defendants cannot truthfully admit or deny the matter. A denial shall fairly meet the substance of the requested admission, and when good faith requires that Kebe qualify an answer or deny only a part of the matter of which an admission is requested, it shall specify so much of it as is true and qualify or deny the remainder.

4. Kebe may not give lack of information or knowledge as a reason for failure to admit or deny unless they state that they have made reasonable inquiry and that information known or readily obtainable by them is insufficient to enable it to admit or deny.

5. If Kebe does not admit an item, she shall:

- (a) Produce to Plaintiff all documents concerning the requested admission in their possession, custody or control;
- (b) State, with particularity, the factual basis upon which Defendants' response is based; and

(c) Identify each and every person with knowledge of the requested admission.

6. These requests for admissions are continuing. Kebe shall promptly supply by way of supplemental responses any and all additional information that may become known prior to any hearing in or trial of this action.

7. Each of the foregoing definitions and instructions is hereby incorporated by reference into, and shall be deemed a part of, each and every other definition and instruction contained herein as well as each specific Request set forth below.

REQUESTS

1. Admit the video identified as CARDI VIDEO 001 is a true, accurate and authentic copy of the video you published on or around September 19, 2018 on YouTube under the account Wino Gang Podcast which depicts your voice and person.

2. Admit the video identified as CARDI VIDEO 002 is a true, accurate and authentic copy of the video you published on or around September 19, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

3. Admit the video identified as CARDI VIDEO 003 is a true, accurate and authentic copy of the video you published on or around November 13, 2018 on YouTube under the account Wino Gang Podcast which depicts your voice and person.

4. Admit the video identified as CARDI VIDEO 004 is a true, accurate and authentic copy of the video you published on or around November 13, 2018 on YouTube under the account Wino Gang Podcast which depicts your voice and person.

5. Admit the video identified as CARDI VIDEO 005 is a true, accurate and authentic copy of the video you published on or around December 17, 2018 on YouTube under the account Wino Gang Podcast which depicts your voice and person.

6. Admit the video identified as CARDI VIDEO 006 is a true, accurate and authentic copy of the video you published on or around April 25, 2019 on YouTube under the account Wino Gang Podcast which depicts your voice.

7. Admit the video identified as CARDI VIDEO 007 is a true, accurate and authentic copy of the video you published on or around February 28, 2019 on a YouTube channel you control which depicts your voice and person.

8. Admit the video identified as CARDI VIDEO 008 is a true, accurate and authentic recording of the video you published on or around March 29, 2019 on an Instagram account that you control which depicts your voice and person.

9. Admit the video identified as CARDI VIDEO 009 is a true, accurate and authentic recording of the video you published on or around March 29, 2019 on an Instagram account that you control which depicts your voice and person.

10. Admit the video identified as CARDI VIDEO 011 is a true, accurate and authentic copy of the video you published on or around January 5, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

11. Admit the video identified as CARDI VIDEO 012 is a true, accurate and authentic copy of the video you published on or around February 15, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

12. Admit the video identified as CARDI VIDEO 013 is a true, accurate and authentic copy of the video you published on or around April 14, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

13. Admit the video identified as CARDI VIDEO 014 is a true, accurate and authentic copy of the video you published on or around April 29, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

14. Admit the video identified as CARDI VIDEO 015 is a true, accurate and authentic copy of the video you published on or around May 17, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

15. Admit the video identified as CARDI VIDEO 016 is a true, accurate and authentic copy of the video you published on or around September 2, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

16. Admit the video identified as CARDI VIDEO 017 is a true, accurate and authentic copy of the video you published on or around September 4, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

17. Admit the video identified as CARDI VIDEO 018 is a true, accurate and authentic copy of the video you published on or around September 8, 2018 on

YouTube under the account unWinewithTashaK which depicts your voice and person.

18. Admit the video identified as CARDI VIDEO 019 is a true, accurate and authentic copy of the video you published on or around September 14, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

19. Admit the video identified as CARDI VIDEO 020 is a true, accurate and authentic copy of the video you published on or around September 19, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

20. Admit the video identified as CARDI VIDEO 021 is a true, accurate and authentic copy of the video you published on or around September 21, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

21. Admit the video identified as CARDI VIDEO 022 is a true, accurate and authentic copy of the video you published on or around October 2, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

22. Admit the video identified as CARDI VIDEO 023 is a true, accurate and authentic copy of the video you published on or around October 29, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

23. Admit the video identified as CARDI VIDEO 024 is a true, accurate and authentic copy of the video you published on or around November 7, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

24. Admit the video identified as CARDI VIDEO 025 is a true, accurate and authentic copy of the video you published on or around November 19, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

25. Admit the video identified as CARDI VIDEO 026 is a true, accurate and authentic copy of the video you published on or around December 7, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

26. Admit the video identified as CARDI VIDEO 027 is a true, accurate and authentic copy of the video you published on or around December 9, 2018 on

YouTube under the account unWinewithTashaK which depicts your voice and person.

27. Admit the video identified as CARDI VIDEO 028 is a true, accurate and authentic copy of the video you published on or around December 9, 2018 on YouTube under the account unWinewithTashaK.

28. Admit the video identified as CARDI VIDEO 029 is a true, accurate and authentic copy of the video you published on or around December 14, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

29. Admit the video identified as CARDI VIDEO 030 is a true, accurate and authentic copy of the video you published on or around December 17, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

30. Admit the video identified as CARDI VIDEO 031 is a true, accurate and authentic copy of the video you published on or around December 17, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

31. Admit the video identified as CARDI VIDEO 032 is a true, accurate and authentic copy of the video you published on or around December 17, 2018 on

YouTube under the account unWinewithTashaK which depicts your voice and person.

32. Admit the video identified as CARDI VIDEO 033 is a true, accurate and authentic copy of the video you published on or around December 18, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

33. Admit the video identified as CARDI VIDEO 034 is a true, accurate and authentic copy of the video you published on or around January 4, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

34. Admit the video identified as CARDI VIDEO 035 is a true, accurate and authentic copy of the video you published on or around February 12, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

35. Admit the video identified as CARDI VIDEO 036 is a true, accurate and authentic copy of the video you published on or around March 26, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

36. Admit the video identified as CARDI VIDEO 037 is a true, accurate and authentic copy of the video you published on or around March 26, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

37. Admit the video identified as CARDI VIDEO 038 is a true, accurate and authentic recording of the video you published on or around March 27, 2019 on an Instagram account that you control which depicts your voice and person.

38. Admit the video identified as CARDI VIDEO 040 is a true, accurate and authentic copy of the video you published on or around April 24, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

39. Admit the video identified as CARDI VIDEO 041 is a true, accurate and authentic copy of the video you published on or around July 8, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

40. Admit the video identified as CARDI VIDEO 042 is a true, accurate and authentic copy of the video you published on or around July 19, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

41. Admit the video identified as CARDI VIDEO 043 is a true, accurate and authentic copy of the video you published on or around July 19, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

42. Admit the video identified as CARDI VIDEO 044 is a true, accurate and authentic copy of the video you published on or around August 23, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

43. Admit the video identified as CARDI VIDEO 045 is a true, accurate and authentic copy of the video you published on or around October 7, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

44. Admit the video identified as CARDI VIDEO 046 is a true, accurate and authentic copy of the video you published on or around November 11, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

45. Admit the video identified as CARDI VIDEO 047 is a true, accurate and authentic copy of the video you published on or around December 30, 2019 on

YouTube under the account unWinewithTashaK which depicts your voice and person.

46. Admit the video identified as CARDI VIDEO 048 is a true, accurate and authentic copy of the video you published on or around January 2, 2020 on YouTube under the account unWinewithTashaK which depicts your voice and person.

47. Admit the video identified as CARDI VIDEO 049 is a true, accurate and authentic copy of the video you published on or around February 1, 2020 on YouTube under the account unWinewithTashaK which depicts your voice and person.

48. Admit the video identified as CARDI VIDEO 050 is a true, accurate and authentic copy of the video you published on or around February 3, 2020 on YouTube under the account unWinewithTashaK which depicts your voice and person.

49. Admit the video identified as CARDI VIDEO 051 is a true, accurate and authentic copy of the video you published on or around February 20, 2020 on YouTube under the account unWinewithTashaK which depicts your voice and person.

50. Admit the video identified as CARDI VIDEO 052 is a true, accurate and authentic copy of the video you published on or around February 28, 2020 on YouTube under the account unWinewithTashaK which depicts your voice and person.

51. Admit the video identified as CARDI VIDEO 053 is a true, accurate and authentic copy of the video you published on or around October 5, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

52. Admit the video identified as CARDI VIDEO 054 is a true, accurate and authentic copy of the video you published on or around December 5, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

53. Admit the video identified as CARDI VIDEO 055 is a true, accurate and authentic copy of the video you published on or around September 4, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

54. Admit the video identified as CARDI VIDEO 056 is a true, accurate and authentic copy of the video you published on or around February 15, 2018 on

YouTube under the account unWinewithTashaK which depicts your voice and person.

55. Admit the video identified as CARDI VIDEO 057 is a true, accurate and authentic copy of the video you published on or around December 21, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

56. Admit the video identified as CARDI VIDEO 058 is a true, accurate and authentic copy of the video you published on or around November 11, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

57. Admit the video identified as CARDI VIDEO 059 is a true, accurate and authentic copy of the video you published on or around September 18, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

58. Admit the video identified as CARDI VIDEO 060 is a true, accurate and authentic copy of the video you published on or around November 29, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

59. Admit the video identified as CARDI VIDEO 061 is a true, accurate and authentic copy of the video you published on or around October 5, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

60. Admit the video identified as CARDI VIDEO 062 is a true, accurate and authentic copy of the video you published on or around December 4, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

61. Admit the video identified as CARDI VIDEO 063 is a true, accurate and authentic copy of the video you published on or around December 30, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

62. Admit the video identified as CARDI VIDEO 064 is a true, accurate and authentic copy of the video you published on or around July 8, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

63. Admit the video identified as CARDI VIDEO 065 is a true, accurate and authentic copy of the video you published on or around February 3, 2020 on

YouTube under the account unWinewithTashaK which depicts your voice and person.

64. Admit the video identified as CARDI VIDEO 066 is a true, accurate and authentic copy of the video you published on or around March 28, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

65. Admit the video identified as CARDI VIDEO 067 is a true, accurate and authentic copy of the video you published on or around October 9, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

66. Admit the video identified as CARDI VIDEO 068 is a true, accurate and authentic copy of the video you published on or around October 12, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

67. Admit the video identified as CARDI VIDEO 069 is a true, accurate and authentic copy of the video you published on or around December 18, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

68. Admit the video identified as CARDI VIDEO 070 is a true, accurate and authentic copy of the video you published on or around February 12, 2020 on YouTube under the account unWinewithTashaK which depicts your voice and person.

69. Admit the video identified as CARDI VIDEO 071 is a true, accurate and authentic copy of the video you published on or around December 17, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

70. Admit the video identified as CARDI VIDEO 072 is a true, accurate and authentic copy of the video you published on or around July 8, 2020 on YouTube under the account unWinewithTashaK which depicts your voice and person.

71. Admit the video identified as CARDI VIDEO 073 is a true, accurate and authentic copy of the video you published on or around January 31, 2020 on YouTube under the account unWinewithTashaK which depicts your voice and person.

72. Admit the video identified as CARDI VIDEO 074 is a true, accurate and authentic copy of the video you published on or around April 13, 2018 on

YouTube under the account unWinewithTashaK which depicts your voice and person.

73. Admit the video identified as CARDI VIDEO 075 is a true, accurate and authentic copy of the video you published on or around January 2, 2020 on YouTube under the account unWinewithTashaK which depicts your voice and person.

74. Admit the video identified as CARDI VIDEO 076 is a true, accurate and authentic copy of the video you published on or around July 8, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

75. Admit the video identified as CARDI VIDEO 077 is a true, accurate and authentic copy of the video you published on or around March 15, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

76. Admit the video identified as CARDI VIDEO 078 is a true, accurate and authentic copy of the video you published on or around March 18, 2020 on YouTube under the account unWinewithTashaK which depicts your voice and person.

77. Admit the video identified as CARDI VIDEO 079 is a true, accurate and authentic copy of the video you published on or around August 19, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

78. Admit the video identified as CARDI VIDEO 080 is a true, accurate and authentic copy of the video you published on or around November 8, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

79. Admit the video identified as CARDI VIDEO 081 is a true, accurate and authentic copy of the video you published on or around November 7, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

80. Admit the video identified as CARDI VIDEO 083 is a true, accurate and authentic copy of the video you published on or around September 19, 2019 on Patreon under the account unWinewithTashaK which depicts your voice and person.

81. Admit the video identified as CARDI VIDEO 084 is a true, accurate and authentic copy of the video you published on or around September 20, 2020 on

YouTube under the account unWinewithTashaK which depicts your voice and person.

82. Admit the video identified as CARDI VIDEO 085 is a true, accurate and authentic copy of the video you published on or around September 21, 2020 on YouTube under the account Wino Gang Podcast which depicts your voice and person.

83. Admit the video identified as CARDI VIDEO 086 is a true, accurate and authentic copy of the video you published on or around September 14, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

84. Admit the video identified as CARDI VIDEO 087 is a true, accurate and authentic copy of the video you published on or around January 4, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

85. Admit the video identified as CARDI VIDEO 088 is a true, accurate and authentic copy of the video you published on or around April 23, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

86. Admit the video identified as CARDI VIDEO 089 is a true, accurate and authentic copy of the video you published on or around October 29, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

87. Admit the video identified as CARDI VIDEO 090 is a true, accurate and authentic copy of the video you published on or around September 7, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

88. Admit the video identified as CARDI VIDEO 091 is a true, accurate and authentic copy of the video you published on or around January 5, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

89. Admit the video identified as CARDI VIDEO 092 is a true, accurate and authentic copy of the video you published on or around September 21, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

90. Admit the video identified as CARDI VIDEO 093 is a true, accurate and authentic copy of the video you published on or around December 15, 2019 on

YouTube under the account unWinewithTashaK which depicts your voice and person.

91. Admit the video identified as CARDI VIDEO 094 is a true, accurate and authentic copy of the video you published on or around February 5, 2020 on YouTube under the account unWinewithTashaK which depicts your voice and person.

92. Admit the video identified as CARDI VIDEO 095 is a true, accurate and authentic copy of the video you published on or around July 19, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

93. Admit the video identified as CARDI VIDEO 096 is a true, accurate and authentic copy of the video you published on or around February 11, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

94. Admit the video identified as CARDI VIDEO 097 is a true, accurate and authentic copy of the video you published on or around February 28, 2020 on YouTube under the account unWinewithTashaK which depicts your voice and person.

95. Admit the video identified as CARDI VIDEO 098 is a true, accurate and authentic copy of the video you published on or around November 19, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

96. Admit the video identified as CARDI VIDEO 099 is a true, accurate and authentic copy of the video you published on or around October 2, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

97. Admit the video identified as CARDI VIDEO 100 is a true, accurate and authentic copy of the video you published on or around July 19, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

98. Admit the video identified as CARDI VIDEO 101 is a true, accurate and authentic copy of the video you published on or around September 18, 2020 on YouTube under the account unWinewithTashaK which depicts your voice and person.

99. Admit the video identified as CARDI VIDEO 102 is a true, accurate and authentic copy of the video you published on or around May 17, 2018 on

YouTube under the account unWinewithTashaK which depicts your voice and person.

100. Admit the video identified as CARDI VIDEO 103 is a true, accurate and authentic copy of the video you published on or around August 23, 2020 on YouTube under the account unWinewithTashaK which depicts your voice and person.

101. Admit the video identified as CARDI VIDEO 104 is a true, accurate and authentic copy of the video you published on or around September 20, 2020 on YouTube under the account unWinewithTashaK which depicts your voice and person.

102. Admit the video identified as CARDI VIDEO 106 is a true, accurate and authentic copy of the video you published on or around [December 4, 2018 on YouTube the account unWinewithTashaK which depicts your voice and person.

103. Admit the video identified as CARDI VIDEO 107 is a true, accurate and authentic copy of the video you published on or around September 25, 2020 on YouTube under the account unWinewithTashaK which depicts your voice and person.

104. Admit the video identified as CARDI VIDEO 108 is a true, accurate and authentic copy of the video you published on or around December 9, 2018 on

YouTube under the account unWinewithTashaK which depicts your voice and person.

105. Admit the video identified as CARDI VIDEO 109 is a true, accurate and authentic copy of the video you published on or around April 17, 2020 on YouTube under the account unWinewithTashaK which depicts your voice and person.

106. Admit the video identified as CARDI VIDEO 110 is a true, accurate and authentic copy of the video you published on or around August 31, 2020 on YouTube under the account unWinewithTashaK which depicts your voice and person.

107. Admit the video identified as CARDI VIDEO 111 is a true, accurate and authentic copy of the video you published on or around May 25, 2019 on YouTube under the account unWinewithTashaK which depicts your voice and person.

108. Admit the video identified as CARDI VIDEO 115 is a true, accurate and authentic copy of the video in which you appeared and were interviewed that also depicts your voice and person.

109. Admit the video identified as CARDI VIDEO 116 is a true, accurate and authentic copy of the video in which you appeared and were interviewed that also depicts your voice and person.

110. Admit the video identified as CARDI VIDEO 117 is a true, accurate and authentic copy of the video in which you appeared and were interviewed that also depicts your voice.

111. Admit the video identified as CARDI VIDEO 119 contains from timestamp from 0:01 to 8:47 true, accurate and authentic recordings of the videos you published on an Instagram account you control which depicts your voice and person.

112. Admit the video identified as CARDI VIDEO 120 is a true, accurate and authentic copy of the video you published on or around September 22, 2020 on YouTube under the account The Wiley Show which depicts your voice and person.

113. Admit the video identified as CARDI VIDEO 121 is a true, accurate and authentic copy of the video you published on or around February 20, 2020 on YouTube under the account unWinewithTashaK which depicts your voice and person.

114. Admit the video identified as CARDI VIDEO 122 is a true, accurate and authentic copy of the video you published on or around January 3, 2019 on

YouTube under the account unWinewithTashaK which depicts your voice and person.

115. Admit the video identified as CARDI VIDEO 123 is a true, accurate and authentic recording of the video you published on or around December 23, 2019 on an Instagram account you control which depicts your voice and person.

116. Admit the video identified as CARDI VIDEO 124 is a true, accurate and authentic copy of the video you published on or around February 15, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

117. Admit the video identified as CARDI VIDEO 125 is a true, accurate and authentic copy of the video you published on or around September 2, 2018 on YouTube under the account unWinewithTashaK which depicts your voice and person.

118. Admit the video identified as CARDI VIDEO 126 is a true, accurate and authentic copy of the video you published on or around September 30, 2020 on Patreon under the account unWinewithTashaK which depicts your voice and person.

Dated: September 30, 2020

Respectfully submitted,

/s/ Lisa F. Moore

Lisa F. Moore (Bar No. 419633)
W. Andrew Pequignot (Bar No. 424546)
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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BELCALIS MARLENIS ALMÁNZAR,

Plaintiff,

v.

LATASHA TRANSRINA KEBE a/k/a
LATASHA TRANSRINA HOWARD and
STARMARIE EBONY JONES,

Defendants.

Case No. 1:19-cv-01301-WMR

CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2020, I emailed PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSION TO DEFENDANT LATASHA TRANSRINA KEBE to Defendant's attorneys of record (pursuant to an agreement by the parties) at the following addresses:

Olga Izmaylova (olga@silawatl.com)
Sadeer Sabbak (ssabbak@silawatl.com)

/s/ Lisa F. Moore

Lisa F. Moore

F-2

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BELCALIS MARLENIS ALMÁNZAR,

Plaintiff,

v.

LATASHA TRANSRINA KEBE a/k/a
LATASHA TRANSRINA HOWARD and
STARMARIE EBONY JONES,

Defendants.

Case No.

1:19-cv-1301-WMR

**DEFENDANT KEBE’S RESPONSES TO PLAINTIFF’S FIRST SET OF
REQUESTS FOR ADMISSION**

COMES NOW, LATASHA KEBE, the Defendant in the above-styled civil action, and submits the following responses to Plaintiff’s First Set of Requests for Admission to Defendant Latasha Transrina Kebe:

Response to Request for Admission No. 1

Ms. Kebe admits.

Response to Request for Admission No. 2

Ms. Kebe admits.

Response to Request for Admission No. 3

Ms. Kebe admits that CARDI VIDEO 003 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on November 13, 2018, on YouTube under the account Wino Gang Podcast.

Response to Request for Admission No. 4

Ms. Kebe admits that CARDI VIDEO 004 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on November 13, 2018, on YouTube under the account Wino Gang Podcast.

Response to Request for Admission No. 5

Ms. Kebe admits.

Response to Request for Admission No. 6

Ms. Kebe admits.

Response to Request for Admission No. 7

Ms. Kebe admits.

Response to Request for Admission No. 8

Ms. Kebe admits that CARDI VIDEO 008 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she published on or around March 29, 2019, on Instagram. Ms. Kebe denies that she controls that Instagram account because Instagram blocked Ms. Kebe from accessing it.

Response to Request for Admission No. 9

Ms. Kebe admits that CARDI VIDEO 009 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she published on or around March 29, 2019, on Instagram. Ms. Kebe denies that she controls that Instagram account because Instagram blocked Ms. Kebe from accessing it.

Response to Request for Admission No. 10

Ms. Kebe admits.

Response to Request for Admission No. 11

Ms. Kebe admits.

Response to Request for Admission No. 12

Ms. Kebe admits that CARDI VIDEO 013, which depicts her voice and person, was streamed live on April 13, 2018, on YouTube under the account unWinewithTashaK. However, the total length of Ms. Kebe's video is 1:24:35 and CARDI VIDEO 013 freezes at 03:41 minutes, therefore Ms. Kebe can neither admit nor deny whether CARDI 013 is a true, accurate, and authentic copy of the video at this time.

Response to Request for Admission No. 13

Ms. Kebe admits.

Response to Request for Admission No. 14

Ms. Kebe admits.

Response to Request for Admission No. 15

Ms. Kebe admits.

Response to Request for Admission No. 16

Ms. Kebe admits.

Response to Request for Admission No. 17

Ms. Kebe admits that CARDI VIDEO 018 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on September 8, 2018, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 18

Ms. Kebe admits.

Response to Request for Admission No. 19

Ms. Kebe admits and notes that this request is duplicative of Request for Admission No. 2 because CARDI VIDEO 020 is the same video as CARDI VIDEO 002.

Response to Request for Admission No. 20

Ms. Kebe admits that CARDI VIDEO 021 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on September 21, 2018, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 21

Ms. Kebe admits that CARDI VIDEO 022 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on October 2, 2018, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 22

Ms. Kebe admits that CARDI VIDEO 023 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on October 29, 2018, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 23

Ms. Kebe admits that CARDI VIDEO 024 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on November 7, 2018, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 24

Ms. Kebe admits.

Response to Request for Admission No. 25

Ms. Kebe admits.

Response to Request for Admission No. 26

Ms. Kebe admits that CARDI VIDEO 027 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on December 9, 2018, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 27

Ms. Kebe admits.

Response to Request for Admission No. 28

Ms. Kebe admits.

Response to Request for Admission No. 29

Ms. Kebe admits that CARDI VIDEO 030 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on December 17, 2018, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 30

Ms. Kebe admits that CARDI VIDEO 031 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she published on September 19, 2018, on YouTube under the account unWinewithTashaK. Ms. Kebe notes that this request is duplicative of Request for Admission No. 2 and Request for

Admission No. 19 because CARDI VIDEO 031 is the same video as CARDI VIDEO 002 and CARDI VIDEO 020.

Response to Request for Admission No. 31

Ms. Kebe admits that CARDI VIDEO 032 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she published on December 17, 2018, on YouTube under the account Wino Gang Podcast. Ms. Kebe notes that this request is duplicative of Request for Admission No. 5 because CARDI VIDEO 032 is the same video as CARDI VIDEO 005.

Response to Request for Admission No. 32

Ms. Kebe admits that CARDI VIDEO 033 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on December 18, 2018, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 33

Ms. Kebe admits that CARDI VIDEO 034 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on January 4, 2019, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 34

Ms. Kebe admits.

Response to Request for Admission No. 35

Ms. Kebe admits.

Response to Request for Admission No. 36

Ms. Kebe admits and notes that this request is duplicative of Request for Admission No. 35 because CARDI VIDEO 037 is the same video as CARDI VIDEO 036.

Response to Request for Admission No. 37

Ms. Kebe admits that CARDI VIDEO 038 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she published on March 27, 2019, on YouTube under the account Wino Gang Podcast.

Response to Request for Admission No. 38

Ms. Kebe admits that CARDI VIDEO 040 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on April 23, 2019, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 39

Ms. Kebe admits.

Response to Request for Admission No. 40

Ms. Kebe admits.

Response to Request for Admission No. 41

Ms. Kebe admits that CARDI VIDEO 043 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on July 19, 2019, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 42

Ms. Kebe admits.

Response to Request for Admission No. 43

Ms. Kebe admits that CARDI VIDEO 045 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on October 7, 2019, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 44

Ms. Kebe admits.

Response to Request for Admission No. 45

Ms. Kebe admits.

Response to Request for Admission No. 46

Ms. Kebe admits.

Response to Request for Admission No. 47

Ms. Kebe admits that CARDI VIDEO 049 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on January 31, 2020, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 48

Ms. Kebe admits.

Response to Request for Admission No. 49

Ms. Kebe admits.

Response to Request for Admission No. 50

Ms. Kebe admits that CARDI VIDEO 052 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on February 28, 2020, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 51

Ms. Kebe admits that CARDI VIDEO 053 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on October 5, 2018, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 52

Ms. Kebe admits that CARDI VIDEO 054 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on December 4, 2018, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 53

Ms. Kebe admits and notes that this request is duplicative of Request for Admission No. 16 because CARDI VIDEO 055 is the same video as CARDI VIDEO 017.

Response to Request for Admission No. 54

Ms. Kebe admits and notes that this request is duplicative of Request for Admission No. 11 because CARDI VIDEO 056 is the same video as CARDI VIDEO 012.

Response to Request for Admission No. 55

Ms. Kebe admits.

Response to Request for Admission No. 56

Ms. Kebe admits and notes that this request is duplicative of Request for Admission No. 44 because CARDI VIDEO 058 is the same video as CARDI VIDEO 046.

Response to Request for Admission No. 57

Ms. Kebe admits.

Response to Request for Admission No. 58

Ms. Kebe admits.

Response to Request for Admission No. 59

Ms. Kebe admits that CARDI VIDEO 061 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on October 5, 2018, on YouTube under the account unWinewithTashaK. Ms. Kebe notes that this request is duplicative of Request for Admission No. 51 because CARDI VIDEO 061 is the same video as CARDI VIDEO 053.

Response to Request for Admission No. 60

Ms. Kebe admits that CARDI VIDEO 062 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on December 4, 2018, on YouTube under the account unWinewithTashaK. Ms. Kebe notes that this request is duplicative of Request for Admission No. 52 because CARDI VIDEO 062 is the same video as CARDI VIDEO 054.

Response to Request for Admission No. 61

Ms. Kebe admits and notes that this request is duplicative of Request for Admission No. 45 because CARDI VIDEO 063 is the same video as CARDI VIDEO 047.

Response to Request for Admission No. 62

Ms. Kebe admits and notes that this request is duplicative of Request for Admission No. 39 because CARDI VIDEO 064 is the same video as CARDI VIDEO 041.

Response to Request for Admission No. 63

Ms. Kebe admits and notes that this request is duplicative of Request for Admission No. 48 because CARDI VIDEO 065 is the same video as CARDI VIDEO 050.

Response to Request for Admission No. 64

Ms. Kebe admits that CARDI VIDEO 066 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on March 28, 2019, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 65

Ms. Kebe admits.

Response to Request for Admission No. 66

Ms. Kebe admits that CARDI VIDEO 068 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on October 12, 2018, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 67

Ms. Kebe admits that CARDI VIDEO 069 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on December 18, 2018, on YouTube under the account unWinewithTashaK. Ms. Kebe notes that this request is duplicative of Request for Admission No. 32 because CARDI VIDEO 069 is the same video as CARDI VIDEO 033.

Response to Request for Admission No. 68

Ms. Kebe admits that CARDI VIDEO 070 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she published on February 12, 2019, on YouTube under the account unWinewithTashaK. Ms. Kebe notes that this request is duplicative of Request for Admission No. 34 because CARDI VIDEO 070 is the same video as CARDI VIDEO 035.

Response to Request for Admission No. 69

Ms. Kebe admits that CARDI VIDEO 071 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on

December 17, 2018, on YouTube under the account unWinewithTashaK. Ms. Kebe notes that this request is duplicative of Request for Admission No. 29 because CARDI VIDEO 071 is the same video as CARDI VIDEO 030.

Response to Request for Admission No. 70

Ms. Kebe admits.

Response to Request for Admission No. 71

Ms. Kebe admits that CARDI VIDEO 073 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on January 31, 2020, on YouTube under the account unWinewithTashaK. Ms. Kebe notes that this request is duplicative of Request for Admission No. 47 because CARDI VIDEO 073 is the same video as CARDI VIDEO 049.

Response to Request for Admission No. 72

Ms. Kebe admits that CARDI VIDEO 074 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on April 13, 2018, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 73

Ms. Kebe admits and notes that this request is duplicative of Request for Admission No. 46 because CARDI VIDEO 075 is the same video as CARDI VIDEO 048.

Response to Request for Admission No. 74

Ms. Kebe admits that CARDI VIDEO 076 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on July 8, 2019, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 75

Ms. Kebe admits that CARDI VIDEO 077 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on March 15, 2019, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 76

Ms. Kebe admits.

Response to Request for Admission No. 77

Ms. Kebe admits that CARDI VIDEO 079 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on August 19, 2020, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 78

Ms. Kebe admits that CARDI VIDEO 080 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on November 8, 2019, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 79

Ms. Kebe admits and notes that this request is duplicative of Request for Admission No. 23 because CARDI VIDEO 081 is the same video as CARDI VIDEO 024.

Response to Request for Admission No. 80

Ms. Kebe admits.

Response to Request for Admission No. 81

Ms. Kebe admits.

Response to Request for Admission No. 82

Ms. Kebe admits.

Response to Request for Admission No. 83

Ms. Kebe admits and notes that this request is duplicative of Request for Admission No. 18 because CARDI VIDEO 086 is the same video as CARDI VIDEO 019.

Response to Request for Admission No. 84

Ms. Kebe admits that CARDI VIDEO 087 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on January 4, 2019, on YouTube under the account unWinewithTashaK. Ms. Kebe

notes that this request is duplicative of Request for Admission No. 33 because CARDI VIDEO 087 is the same video as CARDI VIDEO 034.

Response to Request for Admission No. 85

Ms. Kebe admits that CARDI VIDEO 088 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on April 23, 2019, on YouTube under the account unWinewithTashaK. Ms. Kebe notes that this request is duplicative of Request for Admission No. 38 because CARDI VIDEO 088 is the same video as CARDI VIDEO 040.

Response to Request for Admission No. 86

Ms. Kebe admits that CARDI VIDEO 089 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on October 29, 2018, on YouTube under the account unWinewithTashaK. Ms. Kebe notes that this request is duplicative of Request for Admission No. 22 because CARDI VIDEO 089 is the same video as CARDI VIDEO 023.

Response to Request for Admission No. 87

Ms. Kebe admits that CARDI VIDEO 090 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on September 7, 2018, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 88

Ms. Kebe admits and notes that this request is duplicative of Request for Admission No. 10 because CARDI VIDEO 091 is the same video as CARDI VIDEO 011.

Response to Request for Admission No. 89

Ms. Kebe admits that CARDI VIDEO 092 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on September 21, 2018, on YouTube under the account unWinewithTashaK. Ms. Kebe notes that this request is duplicative of Request for Admission No. 20 because CARDI VIDEO 092 is the same video as CARDI VIDEO 021.

Response to Request for Admission No. 90

Ms. Kebe admits.

Response to Request for Admission No. 91

Ms. Kebe admits.

Response to Request for Admission No. 92

Ms. Kebe admits that CARDI VIDEO 095 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on July 19, 2019, on YouTube under the account unWinewithTashaK. Ms. Kebe notes that

this request is duplicative of Request for Admission No. 41 because CARDI VIDEO 095 is the same video as CARDI VIDEO 043.

Response to Request for Admission No. 93

Ms. Kebe admits.

Response to Request for Admission No. 94

Ms. Kebe admits that CARDI VIDEO 097 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on February 28, 2020, on YouTube under the account unWinewithTashaK. Ms. Kebe notes that this request is duplicative of Request for Admission No. 50 because CARDI VIDEO 097 is the same video as CARDI VIDEO 052.

Response to Request for Admission No. 95

Ms. Kebe admits and notes that this request is duplicative of Request for Admission No. 24 because CARDI VIDEO 098 is the same video as CARDI VIDEO 025.

Response to Request for Admission No. 96

Ms. Kebe admits that CARDI VIDEO 099 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on October 2, 2018, on YouTube under the account unWinewithTashaK. Ms. Kebe

notes that this request is duplicative of Request for Admission No. 21 because CARDI VIDEO 099 is the same video as CARDI VIDEO 022.

Response to Request for Admission No. 97

Ms. Kebe admits and notes that this request is duplicative of Request for Admission No. 40 because CARDI VIDEO 100 is the same video as CARDI VIDEO 042.

Response to Request for Admission No. 98

Ms. Kebe admits that CARDI VIDEO 101 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on September 18, 2020, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 99

Ms. Kebe admits and notes that this request is duplicative of Request for Admission No. 14 because CARDI VIDEO 102 is the same video as CARDI VIDEO 015.

Response to Request for Admission No. 100

Ms. Kebe admits.

Response to Request for Admission No. 101

Ms. Kebe admits.

Response to Request for Admission No. 102

Ms. Kebe admits.

Response to Request for Admission No. 103

Ms. Kebe admits that CARDI VIDEO 107 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on September 25, 2020, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 104

Ms. Kebe admits that CARDI VIDEO 108 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on December 9, 2018, on YouTube under the account unWinewithTashaK. Ms. Kebe notes that this request is duplicative of Request for Admission No. 26 because CARDI VIDEO 108 is the same video as CARDI VIDEO 027.

Response to Request for Admission No. 105

Ms. Kebe admits that CARDI VIDEO 109 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on April 17, 2020, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 106

Ms. Kebe admits.

Response to Request for Admission No. 107

Ms. Kebe admits.

Response to Request for Admission No. 108

Ms. Kebe admits.

Response to Request for Admission No. 109

Ms. Kebe admits.

Response to Request for Admission No. 110

Ms. Kebe admits.

Response to Request for Admission No. 111

Ms. Kebe admits that CARDI VIDEO 119 contains from timestamp 0:01 to 8:47 true, accurate, and authentic copies of videos, which depict her voice and person, that she published on Instagram. Ms. Kebe denies that she controls that Instagram account because Instagram blocked Ms. Kebe from accessing it.

Response to Request for Admission No. 112

Ms. Kebe admits that CARDI VIDEO 120 from timestamp 01:20 to 57:40 is a true, accurate, and authentic copy of the video, which depicts her voice and person, in which she appeared and was interviewed. Ms. Kebe denies publishing CARDI VIDEO 120 on YouTube under the account The Wiley Show because that is not her

YouTube account and she has no access or control over content published under that account.

Response to Request for Admission No. 113

Ms. Kebe admits and notes that this request is duplicative of Request for Admission No. 49 because CARDI VIDEO 121 is the same video as CARDI VIDEO 051.

Response to Request for Admission No. 114

Ms. Kebe admits.

Response to Request for Admission No. 115

Ms. Kebe admits.

Response to Request for Admission No. 116

Ms. Kebe admits and notes that this request is duplicative of Request for Admission No. 11 and Request for Admission No. 55 because CARDI VIDEO 124 is the same video as CARDI VIDEO 012 and CARDI VIDEO 057.

Response to Request for Admission No. 117

Ms. Kebe admits and notes that this request is duplicative of Request for Admission No. 15 because CARDI VIDEO 125 is the same video as CARDI VIDEO 016.

Response to Request for Admission No. 118

Ms. Kebe admits.

Respectfully submitted this 29th day of October, 2020.

/s/Olga Izmaylova
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